

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT COLUMBIA**

CARLOS FARRIS)
#391233,)
)
Plaintiff,) **Case No.: 1:23-cv-00024**
)
v.) **JUDGE CAMPBELL**
) **MAGISTRATE JUDGE HOLMES**
)
DAVID BAKER, ET AL.)
)
Defendants.)

**MEMORANDUM IN SUPPORT OF MOTION TO STRIKE
FILED ON BEHALF OF DEFENDANTS MADDOX, BAKER, AND HARRIS**

Defendants Maddox, Baker, and Harris, submit this memorandum in support of their motion to strike various documents/pleadings filed by the plaintiff, thereby placing these items into the record. The Plaintiff filed into the court record Answers to Request for Production (D.E. 50)¹, Plaintiff's Interrogatories to Defendants (D.E. 52), and Responses to Interrogatories (D.E. 53). In addition, Plaintiff has filed a document outlining damages that he is seeking in this case. (D.E. 57). It is not clear whether this is an attempt to amend his complaint or is responsive to the interrogatories propounded by these defendants. However, these documents are all filed in violation of Rule 5(d)(1)(A) of the Federal Rules of Civil Procedure, as such entries into the record prior to use in the proceeding or court order is prohibited. They are unauthenticated, uncertificated, and/or inadmissible evidence placed into the technical record inappropriately. Therefore, these

¹ These defendants would draw the Court's attention to the fact that D.E. 50 is actually not responsive at all to the request for information sought by these defendants.

defendants contend that the information within these materials is not necessary nor appropriate to be part of the technical record at this time. For the reasons stated, these defendants respectfully request that this Court grant an Order striking Docket Entries No. 50, 52, 53, and 57 from the record.

In addition, Plaintiff has filed a request for subpoenas to be served on particular witnesses for the hearing of this matter. (D.E. 54). This motion appears to be premature and, therefore, these defendants also seek to strike this request.

Respectfully submitted,

/s/ Robyn Beale Williams
Robyn Beale Williams, BPR #19736
FARRAR | BATES | BEREXA
12 Cadillac Drive, Suite 480
Brentwood, Tennessee 37207
Phone: 615-254-3060
Fax: 615-254-9835
rwilliams@fbb.law
*Counsel for Roger Maddox, David Baker, and
Brandon Harris*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this the 4th day of September, 2024, a true and correct copy of the foregoing has been forwarded via the Courts electronic filing system or US Mail, to:

Carlos M. Farris
#391233
2520 Union Springs Rd.
Whiteville, TN 38075
Pro Se Plaintiff

Kitchen Steward Kacy
Trinity Food Services
Maury County Jail
1300 Lawson White Drive
Columbia, TN 38401
Defendant

Alexander B. Chosid
TKC Holdings
10880 Lin Page Boulevard
St. Louis, MO 63132
Phone: 314-214-2806
Alex.Chosid@tkcholdings.com
Counsel for Trinity Food Services

Sean C. Wlodarczyk (#30410)
EVANS, JONES & REYNOLDS
401 Commerce St. Ste. 710
Nashville, TN 37219
Swlodarczyk@ejrlaw.com
P: (615) 259-4685
Attorney for Defendant Trinity Food Services

/s/ Robyn Beale Williams
Robyn Beale Williams